

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF PUERTO RICO**

**IN RE:**

**La Fundadora, Inc.  
Juan Miguel Munoz Roldan  
Patricia Yvonne Galindez Matos  
  
DEBTORS**

**CASE NO. 09-05820 SEK  
consolidated with 09-05922 SEK**

**CHAPTER 12**

**MOTION TO AMEND SCHEDULE A**

**TO THE HONORABLE COURT:**

**COMES NOW** Debtors through the undersigned attorney and respectfully request and pray for the following:

1. Debtors filed a Chapter 12 Petition on July 15, 2009 which confirmation of plan still pending.
2. Debtors are amending, as requested at the Meeting of Creditors by the Chapter 12 Trustee, the Schedule A to reflect the registry description. Enclosed amended schedules.
3. Debtors request for this Honorable Court to take notice of the amendments completed in the schedules.

**WHEREFORE**, Debtors pray for an Order granting this motion with any other procedure that in accordance to law this Honorable Court deems just and proper.

**I CERTIFY** that this motion has been filed electronically with the Clerk of the Bankruptcy Court using CM/ECF which will forward a copy of the same to the office of Jose R. Carrion Morales, esq., Chapter 12 Trustee, and to all creditors and parties in interest as per the Master Address List.

In Caguas, Puerto Rico, this 5 day of October of 2009.

**VICTOR GRATACOS DIAZ LAW OFFICE**  
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By: /s/ Victor Gratacos-Diaz (127906)

IN RE LA FUNDADORA, INC

Case No. 09-05820-12

Debtor(s)

(If known)

**SCHEDULE A - REAL PROPERTY**

Except as directed below, list all real property in which the debtor has any legal, equitable, or future interest, including all property owned as a cotenant, community property, or in which the debtor has a life estate. Include any property in which the debtor holds rights and powers exercisable for the debtor's own benefit. If the debtor is married, state whether the husband, wife, both, or the marital community own the property by placing an "H," "W," "J," or "C" in the column labeled "Husband, Wife, Joint, or Community." If the debtor holds no interest in real property, write "None" under "Description and Location of Property."

Do not include interests in executory contracts and unexpired leases on this schedule. List them in Schedule G - Executory Contracts and Unexpired Leases.

If an entity claims to have a lien or hold a secured interest in any property, state the amount of the secured claim. See Schedule D. If no entity claims to hold a secured interest in the property, write "None" in the column labeled "Amount of Secured Claim."

If the debtor is an individual or if a joint petition is filed, state the amount of any exemption claimed in the property only in Schedule C - Property Claimed as Exempt.

DESCRIPTION AND LOCATION OF PROPERTY	NATURE OF DEBTOR'S INTEREST IN PROPERTY	HUSBAND, WIFE, JOINT, OR COMMUNITY	CURRENT VALUE OF DEBTOR'S INTEREST IN PROPERTY WITHOUT DEDUCTING ANY SECURED CLAIM OR EXEMPTION	AMOUNT OF SECURED CLAIM
DAIRY FARM WITH MILKING BUILDING, RANCH, HANGAR, WELLS WITH 44592 CDAS AT BO RANCHO CARR 444 KM 7 HM 4 MOCA, PR. THIS PROPERTY IS REGISTERES AT THE PUBLIC REGISTRY OF MOCA, TITLE 216, PAGE 250, PROPERTY NO. 12,184.		C	676,492.00	1,944,750.50
LOT OF LAND WITH 1.971 CDAS LOCATED AT CARR 444 KM 7.4 BO ROCHA MOCA PR 00678. THIS PROPERTY IS NOT REGISTERED IN THE PROPERTY REGISTRY OF PUERTO RICO.		C	25,000.00	0.00
LOT OF LAND WITH 11.26 CDAS LOCATED AT CARR 444 KM 7.4 BO ROCHA MOCA PR 00678. THIS PROPERTY IS REGISTERED AT THE PUBLIC REGISTRY OF MOCA, TITLE 125 AND 375, PAGE 18 & 125, PROPERTY NO. 5,1116.		C	110,000.00	1,944,750.50
LOT OF LAND WITH 15 CENTIMOS LOCATED AT CARR 444 KM 7.4 BO ROCHA MOCA PR 00678. THIS PROPERTY IS NOT REGISTERED AT THE PUBLIC REGISTRY.		C	5,000.00	0.00
LOT OF LAND WITH 160.699 CDAS LOCATED AT CARR 444 KM 7.4 BO ROCHA MOCA PR 00678 TITLE 115 PAGE COMPOSED OF LOT OF LAND 130.0 CDAS		C	1,286,989.00	1,944,750.50
LOT OF LAND WITH 6553. SQ MTS LOCATED AT CARR 444 KM 7.4 BO ROCHA MOCA PR 00678 REGISTERED AT THE PUBLIC REGISTRY OF MOCA, TITILE 81, PAGE 91, PROPERTY NO. 3281.		C	6,600.00	0.00
LOT OF LAND WITH A STRUCTURE WITH 1CDA AT CARR 444 KM 7 HM 4 BO ROCHA MOCA 00676. THIS PROPERTY IS NOT REGISTERED AT THE PUBLIC REGISTRY.		C	10,000.00	1,944,750.50
RESIDENTIAL HOUSE WITH THREE BEDROOMS, TWO BATHROOMS, DINING AND LIVING ROOM, KITHCEN, PORCH, AND OFFICE WITH 1 CDA AT BO ROCHA CARR 444 KM 7 HM 4 MOCA, PR. THIS PROPERTY IS NOT REGISTERED IN THE PUBLIC REGISTRY.		C	50,000.00	0.00

TOTAL 2,170,081.00

(Report also on Summary of Schedules)

IN RE LA FUNDADORA, INC

Case No. 09-05820-12

Debtor(s)

(If known)

**DECLARATION CONCERNING DEBTOR'S SCHEDULES**

**DECLARATION UNDER PENALTY OF PERJURY BY INDIVIDUAL DEBTOR**

I declare under penalty of perjury that I have read the foregoing summary and schedules, consisting of \_\_\_\_\_ sheets, and that they are true and correct to the best of my knowledge, information, and belief.

Date: \_\_\_\_\_ Signature: \_\_\_\_\_ Debtor

Date: \_\_\_\_\_ Signature: \_\_\_\_\_ (Joint Debtor, if any)

[If joint case, both spouses must sign.]

**DECLARATION AND SIGNATURE OF NON-ATTORNEY BANKRUPTCY PETITION PREPARER (See 11 U.S.C. § 110)**

I declare under penalty of perjury that: (1) I am a bankruptcy petition preparer as defined in 11 U.S.C. § 110; (2) I prepared this document for compensation and have provided the debtor with a copy of this document and the notices and information required under 11 U.S.C. §§ 110(b), 110(h), and 342 (b); and, (3) if rules or guidelines have been promulgated pursuant to 11 U.S.C. § 110(h) setting a maximum fee for services chargeable by bankruptcy petition preparers, I have given the debtor notice of the maximum amount before preparing any document for filing for a debtor or accepting any fee from the debtor, as required by that section.

Printed or Typed Name and Title, if any, of Bankruptcy Petition Preparer

Social Security No. (Required by 11 U.S.C. § 110.)

If the bankruptcy petition preparer is not an individual, state the name, title (if any), address, and social security number of the officer, principal, responsible person, or partner who signs the document.

Address

Signature of Bankruptcy Petition Preparer

Date

Names and Social Security numbers of all other individuals who prepared or assisted in preparing this document, unless the bankruptcy petition preparer is not an individual:

If more than one person prepared this document, attach additional signed sheets conforming to the appropriate Official Form for each person.

A bankruptcy petition preparer's failure to comply with the provision of title 11 and the Federal Rules of Bankruptcy Procedure may result in fines or imprisonment or both. 11 U.S.C. § 110; 18 U.S.C. § 156.

**DECLARATION UNDER PENALTY OF PERJURY ON BEHALF OF CORPORATION OR PARTNERSHIP**

I, the **PRESIDENT** (the president or other officer or an authorized agent of the corporation or a member or an authorized agent of the partnership) of the **LA FUNDADORA, INC** (corporation or partnership) named as debtor in this case, declare under penalty of perjury that I have read the foregoing summary and schedules, consisting of **17** sheets (total shown on summary page plus 1), and that they are true and correct to the best of my knowledge, information, and belief.

Date: **October 11, 2009** Signature: **/s/ PATRICIA Y GALINDEZ MATOS**

**PATRICIA Y GALINDEZ MATOS**

(Print or type name of individual signing on behalf of debtor)

[An individual signing on behalf of a partnership or corporation must indicate position or relationship to debtor.]

Penalty for making a false statement or concealing property: Fine of up to \$500,000 or imprisonment for up to 5 years or both. 18 U.S.C. §§ 152 and 3571.